

PARKER POHL LLP

99 Park Avenue | T 212-202-8886
Suite 1510 | F 646-924-3100
New York, NY 10016 | parkerpohl.com

Shelly L. Friedland
shelly.friedland@parkerpohl.com

August 28, 2024

VIA ECF

Hon. Jennifer Willis
United States Magistrate Judge
Southern District of New York
40 Foley Square, Room 425
New York, NY 10007

Re: **Second Request for Adjournment of Class Certification Motion
Briefing**
Avchukov et al v. Avant Gardner, LLC et al., 1:23-CV-08106-VM
Brockmole et al v. EZ Festivals LLC et al., 1:23-CV-08106-VM

Dear Magistrate Judge Willis,

On behalf of Plaintiffs in the above-referenced matters, we write to request an adjournment of the deadline for Plaintiffs' motion for class certification, which is presently due on August 29, 2024. Defendants' opposition is due September 30, 2024, and Plaintiffs' reply is due on October 18, 2024 – which is after the settlement conference currently scheduled for October 8, 2024. We are requesting this extension based on our assessment that adjourning class certification briefing until after the settlement conference would enable the parties to take into account the result of that conference. If the parties are successful, Plaintiffs would move to certify a settlement class. Further, the conference itself may provide insight into issues to be addressed in the class certification briefing. We have requested one extension of this deadline previously. Counsel for Defendants have consented to this request.

Accordingly, we request the following briefing schedule:

Plaintiffs' opening brief:	November 8, 2024
Defendants' opposition:	December 9, 2024
Plaintiffs' reply brief:	December 27, 2024

We are available at your convenience if you have questions on this matter.

Respectfully submitted,


Shelly L. Friedland